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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
:   
v. : Hon. Michael A. Hammer  
:   
ANDRE CARTER : Mag. No. 24-10118  
:   
:

I, Caroline Blanchard, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

/s/ Caroline Blanchard/JMM

Caroline Blanchard, Special Agent  
Bureau of Alcohol, Tobacco, Firearms &  
Explosives

Special Agent Caroline Blanchard attested to this Complaint by telephone pursuant to F.R.C.P. 4.1(b)(2)(A) on this 16th day of May, 2024.

/s/ Hon. Michael A. Hammer/JMM

Honorable Michael A. Hammer  
United States Magistrate Judge

**ATTACHMENT A**

**COUNT ONE**

(Possession of Machineguns)

On or about May 14, 2024, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

**ANDRE CARTER,**

did knowingly possess machineguns, as defined in Title 26, United States Code, Section 5845(b), namely, twenty (20) machinegun conversion devices.

In violation of Title 18, United States Code, Section 922(o)(1).

**COUNT TWO**

(Possession of Firearms and Ammunition by a Convicted Felon)

On or about May 14, 2024, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**ANDRE CARTER,**

knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess a firearm, namely one (1) Glock 19 Gen5, 9mm pistol, bearing serial number BRXN288; one (1) Sig Sauer, model P365, 9mm pistol, bearing serial number 66B949269; one (1) Anderson Manufacturing model AM-15, .556 caliber rifle, bearing serial number 22029844; nineteen (19) rounds of Hornady 9mm ammunition; and thirty-three (33) rounds of Giulio-Fiocchi-Lecco ("GFL") 9mm ammunition, and the firearms and ammunition were in and affecting interstate commerce.

In violation of Title 18, United States Code, Section 922(g)(1).

**ATTACHMENT B**

I, Caroline Blanchard, am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms & Explosives. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and other evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. At times relevant to this Complaint the defendant, Andre Carter ("CARTER"), resided in the vicinity of Bloomfield, New Jersey.

2. Law enforcement, including special agents with ATF, have been investigating CARTER in connection with illegal firearms sales in New Jersey.

3. On or about May 14, 2024, at approximately 2:09 p.m., an undercover law enforcement officer ("UC-1") who previously interacted with CARTER called a phone number he knew belonged to CARTER and told CARTER that he was preparing to drive to a predetermined location in Essex County to meet CARTER for a firearms transaction.

4. At approximately 2:18 p.m., UC-1 arrived at the predetermined location and parked his undercover vehicle ("UCV"). At approximately 2:20 p.m., CARTER arrived at the same location in a black Toyota Camry (the "Camry"), bearing New Jersey registration V75SMA. According to the National Law Enforcement Telecommunication System ("NLETS"), the registered owner for the Camry is Andre S. Carter with a birthdate of September 27, 1971.

5. After CARTER arrived, he exited the Camry and UC-1 observed CARTER place a firearm and gloves in the front pocket of his sweatshirt. CARTER then removed from the trunk of the Camry a large black garbage bag and a green Crown Royal bag. CARTER next entered the rear passenger door of the UCV. CARTER placed the large black garbage bag on the floor of the UCV and the green Crown Royal bag on the center console.

6. Once CARTER was in the UCV, he removed from the front pocket of his sweatshirt one (1) Sig Sauer, model P365, 9mm pistol, bearing serial number 66B949269 and handed it to UC-1. CARTER also removed the gloves from the front pocket of his sweatshirt and placed the gloves on the front passenger seat. CARTER explained to UC-1 that the gloves contained twenty (20) of the "thing for the back," which was a reference to twenty (20) machinegun conversion devices that can be attached to the back of a semiautomatic firearm rendering the firearm capable of being fired in fully automatic mode. CARTER added with respect to the machinegun conversion devices, "I can get many more of those."

7. Next, CARTER pointed to the large garbage bag that he placed on the floor of the UCV and told UC-1, “this the big boy,” but CARTER did not remove anything from the garbage bag at that time.

8. UC-1 then opened the green Crown Royal bag and removed one (1) Glock 19 Gen5, 9mm pistol along with several extended magazines that contained 9mm ammunition for the Glock and Sig Sauer pistols.

9. After CARTER provided UC-1 the firearms and ammunition, he said that the price for the firearms and ammunition was \$13,500. UC-1 told CARTER that he only had \$6,000. CARTER agreed to accept the \$6,000 and to get the remainder of the payment at a later date. At approximately 2:30 p.m., CARTER got out of the UCV, entered the Camry, and drove away.

10. Following the transaction, UC-1 was followed by law enforcement to a predetermined location. At that location, UC-1 provided law enforcement the following firearms that he purchased from CARTER (collectively, the “Firearms”):

- a. one (1) Glock 19 Gen5, 9mm pistol, bearing serial number BRXN288;
- b. one (1) Sig Sauer, model P365, 9mm pistol, bearing serial number 66B949269; and
- c. one (1) Anderson Manufacturing model AM-15, .556 caliber rifle, bearing serial number 22029844 and a one hundred (100) round drum magazine.

11. UC-1 also provided law enforcement the following ammunition that he purchased from CARTER (collectively, the “Ammunition”):

- a. nineteen (19) rounds of Hornady 9mm ammunition; and
- b. thirty-three (33) rounds of Giulio-Fiocchi-Lecco (“GFL”) 9mm ammunition.

12. Additionally, UC-1 provided law enforcement the twenty (20) machinegun conversion devices, which render a firearm capable of being fired in fully automatic mode (collectively, the “Machineguns”). The Machineguns meet the federal definition of a machinegun, as defined in Title 26, United States Code, Section 5845(b).

13. The Firearms and Ammunition were manufactured outside the State of New Jersey, and thus necessarily traveled in interstate commerce prior to May 14, 2024.

14. Prior to knowingly possessing the Firearms and Ammunition, CARTER knew that he had previously been convicted of a crime punishable by imprisonment for a term exceeding one (1) year. For example, on or about September 2, 1994, CARTER was convicted in the Superior Court of New Jersey, Bergen County, of several drug offenses, including distributing controlled dangerous substances on school property in violation Title 2C, New Jersey Code of Criminal Justice, Section 35-7. CARTER was sentenced to three (3) years' imprisonment for those drug offenses. Law enforcement believes, therefore, that CARTER knew on or about May 14, 2024 that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year.